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VIA CM/ECF FILING

February 15, 2020

Hon. Mark L. Wolf
U.S. District Court
District of Massachusetts
1 Courthouse Way
Boston, MA 02210

Re: U.S. v. Daren DeJong, 18-cr-10307
Letter/Non-Motion re: Commonwealth v. David Keefe, 1884CR00959 & 1884CR00762

Dear Judge Wolf,

In a prior supplemental filing in aid of sentencing, *see* ECF#79 n.3, I brought to this Court's attention the fact that the Commonwealth intends to call my client, Daren DeJong ("my client"), as a witness during its case-in-chief in the trial of State Police Lt. David Keefe for alleged overtime abuse, and that trial had been scheduled to commence in Suffolk County Superior Court on March 23, 2020. In response to a related inquiry by this Honorable Court, I answered that it was my preference/hope to postpone my client's sentencing until the trial in *Commonwealth v. Keefe* ("the trial") is concluded.

On Monday February 10 I was advised, via email, by counsel for the Commonwealth¹ that a guilty plea does not appear likely and, as such, the trial was rescheduled by agreement of the parties to June 22, 2020. The Commonwealth stated further that they will be in touch with me regarding my client's [witness] prep.

To the extent this change in trial date might affect the scheduling of DeJong's sentencing on this Court's busy docket, I believed it prudent to advise Your Honor of this change as soon as was practicable. It remains my, and my client's hope/request, as has also been previously communicated to the Commonwealth, that sentencing can be continued until after the trial is over.

¹ Assistant Attorney General John J. Reynolds.

Sincerely,

/s/ R. Bradford Bailey
R. Bradford Bailey

Cc (via ECF): AUSAs Dustin Chao & Mark Grady